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Dear Dr. Summerson,

The supplement to the Yucca Mountain Project Draft Environmental Impact Statement (SDEIS) released May 4, 2001 by the Department of Energy (DOE) is insufficient and must be revised. In this SDIES and in the Draft Environmental Impact Statement (DEIS), members of the DOE neglect to fully measure the economic, social, and environmental consequences the project will have for national and international communities. The SDIES does not measure the long and short term economic and health impacts that the Yucca Mountain Project's evolving designs will have on workers, Native American communities, and communities along waste transport routes. Also, the SDEIS omits from the design and planning process all viewpoints except those of select DOE and DOE-contracted scientists and engineers. It neglects to fully present the whole ecological footprint of the evolving designs, and it disregards the source of the problem, which is the continual creation of spent fuel that the Yucca Mountain Project may have to accommodate in the future.

1 The SDEIS evolving design puts workers at greater risk. The low temperature design increases worker's exposure to radioactive waste during the fuel blending and repackaging process, a procedure that has never been done before (p. 3-10). The effects of this prolonged exposure on workers, their offspring, and succeeding generations of offspring, are not documented.

2 The evolving design and its manifestations do not incorporate opposing and alternative viewpoints. It is DOE's responsibility to integrate the public's comments from the DEIS into the decision making and design planning processes. The SDEIS discredits and disrespects all the people who have formally commented about the project because it excludes their viewpoints and the alternative programs they offered for high-level nuclear waste containment. 3 The few times that opposition to the project is presented, it is contained within a terse statement at the bottom of a page. For example, at the bottom of page S-5, which contains table S-2, the phrase "Opposing Native American Viewpoint" is printed. Simply writing "Opposing Native American viewpoint" is insufficient, and does not recognize and take into account the federal governments historic, centuries old process of disenfranchising and obliterating Native American lives and voices.

4 This process, known as cultural genocide, is furthered by the SDEIS, which promotes a project that Native Americans have repeatedly voiced opposition to. "Opposing Native American viewpoint" should not be restricted to the sections that the federal government requires the DOE to actually consider diverse viewpoints but it should precede every topic, and an explanation of the contested land should comprise the SDEIS introduction. Although the land slated for use as a repository is currently "under federal control" the Western Shoshone hold title to the land according to the 1863 Treaty of Ruby Valley and were forcibly evicted in 1950 under an unjust expression of this "federal control." The SDEIS must address how the impact of illegal manipulation of Western Shoshone land effects the Western Shoshone, all Native American and indigenous nations, and all United States citizens.

5... The SDEIS also evaluates what are deemed "cultural resources" (p. 3-8 & 3-9). Sacred sites and burial sites, are like temples, churches, and cemeteries. However these places are dismissively and patronizingly referred to as "cultural resources," and then deemed expendable. This maintains the program of cultural genocide - the reigning government commodifies a person's spirituality, and then allow those commodities to be destroyed removed, manipulated, and misplaced behind glass in a museum. Midway Valley has known sites, and the DOE's stated goal is to avoid the area as much as possible. Yet "[h]uman

5 cont activities and increased access could result in harmful effects, both intentional and unintentional, to these fragile resources" (p. 3-8 & 3-9). This is not acceptable - Midway Valley and all of Yucca Mountain must be avoided.

6 There are other ways that the SDEIS is insufficient. It does not fully present the ecological footprint of this evolving design. The combined impacts that resource use on and off site have on land, animals, air, water, and rock must be presented for every gradation of change in the repository design. Human health effects must be investigated fully by DOE and non-DOE scientists alike. Detailed impact studies must be presented clearly and widely to the general public. The SDEIS must present studies of various accident scenarios, which it does not. How will a crack in the multiple fuel ponds, accidents along transportation routes, mislabeling or misrecording of waste package contents, unforeseeable problems with the young alloy-22, and errors in the fuel blending process, effect communities and lands in the nuclear reactor, waste transportation corridor, and repository communities? The SDEIS needed to present the potential effects of these and all other likely accidents and mishaps, and did not do so.

7 Finally, the SDEIS neglects to address the fact that as we speak high-level waste is building up at reactors across the country as 6 metric tons of highly radioactive, toxic, problematic, dubiously containable waste is created every day. Will the evolving SDEIS repository design have to expand further to accommodate the growing amounts of waste? Will the evolving repository design be a model for another site near Yucca Mountain, to at another geologic repository in the US? Will hasty acceptance of this evolving design influence other countries to adopt this untested model, due to the United State's powerful international status? At this rate, as long as nuclear power and nuclear militarism are condoned, we will always have health related problems that stem from uranium mining, processing, and waste disposal. Nuclear utilities are currently absolved of their responsibility to dispose of their own waste. Therefore, according to the model of waste consolidation, either this evolving design will have to expand to accommodate the nations waste, or more Yucca Mountains will have to be built around the nation. The model of centralizing the nations nuclear waste is not viable because the amount of the waste keeps growing, and the waste is so hot that design problems abound. Isolation and containment of such massive amounts of waste poses immense problems, and is unsafe.

9 It is clear that this SDEIS to the Yucca Mountain Project puts people and ecosystems at an unnecessarily high risk of radiation contamination. I urge the DOE to truly inform the people of this supplement's contents via a full media campaign, and to incorporate all views into this and future DEIS's and supplements. The repository design evolves, and therefore a continuous public comment period should parallel the continuous design changes. The document is incomplete and therefore the SDEIS and the DEIS should be rewritten.

Thank You for your work to keep the Yucca Mountain Project open to public comment - we hope that the public's voice is listened to and that the project is shut down on the basis of sound science and on the basis of peaceable international relations with the Western Shoshone. Neither the DOE, the Department of Defense, nor the BLM hold title to this land. The Western Shoshone National Council will not give up title. The DOE has neglected this fact, and must address it immediately.

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